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October 25, 2013

The Honorable Peter F. Murphy, Jr.
Chairman, Fairfax County Planning Commission
12000 Government Center Parkway Suite 330
Fairfax, Virginia 22035

VIA E-MAIL ONLY TO plancom@fairfaxcounty.gov

Re: ST09-III-DS1; SO7-III-UP2
Public Hearing Date: October 30, 2013
Recommendations of Route 28 South Special Study Work Group

Dear Mr. Chairman:

On behalf of the Route 28 South Special Study Work Group (the "Work Group"), I am pleased to offer the following comments. They are intended to provide insight and perspective on both the substantive positions taken by the Work Group and the process it has followed to reach its conclusions and recommendations. The members of the Work Group have met from time to time since May of 2010. They have listened carefully to the findings and recommendations of the County's planning and transportation staff. They have also sought and received valuable input from landowners and other stakeholders in the Study Area.

The Work Group believes the Study Area has unique attributes making it distinctive within the Dulles Corridor. Among them are its close proximity to Dulles Airport, the number of relatively new, well-designed, and successful office and mixed-use developments not yet candidates for redevelopment, environmental features worthy of protection, and existing stable residential neighborhoods. Consequently, while general consistency in policy and planning within the Phase II Dulles Rail Corridor is important, the Work Group does not believe that a "one size fits all" approach is appropriate in so far as the Study Area differs in significant respects from other Dulles rail station sites.

Over the course of this process, we have engaged in a consistent and productive dialog with County staff. While we did not always share the same initial perspective, in nearly all instances the members of the Work Group and Staff, through an open and constructive exchange, were able to reach consensus both preserving consistency in County policy and respecting the unique attributes of the Study Area. With two exceptions, this process has resulted in complete alignment between the positions of the Work Group and Staff on the proposed Comprehensive Plan text amendments.

As the Planning Commission begins its consideration of this important work, I want to share with you and your colleagues the core principles and philosophy which have led us to our recommendations. In particular, I note the following:

- Our goal is to facilitate well designed near-term Transit Oriented Development in the Study Area. While we appreciate and respect the need for long-term planning, policy objectives beyond the 2030 study horizon should be carefully balanced with the goal of promoting near-term Transit Oriented Development.
- Recognizing that much of the Study Area is either already developed or approved for development, future development in line with the Plan recommendations will require sufficient incentives for landowners to depart from existing entitlements. We believe that encouraging owners to enter the land use process yields better outcomes for all stakeholders.
- The Study Area is currently home to a number of well-designed projects. The same collective attention to design should be reflected in the objectives for re-development. Notwithstanding some of the established quality of many existing mixed-use projects, the Work Group believes that current and historic planning guidance has been proportionally weak on issues of urban design. We urge the Planning Commission and the Department of Planning and Zoning to develop urban design guidelines as soon as possible for inclusion in the Policy Plan of the Comprehensive Plan.
- There are stable residential neighborhoods within or adjacent to the Study Area particularly along the southern boundary of the Transit Station Area. New development and re-development should provide reasonable transitions to the existing neighborhoods.
- Subject to the exception discussed below, the Work Group supports the Affordable and Work Force Housing recommendations in the revised Plan language. The Work Group was instrumental in working with Staff to develop the recommended sliding scale for fixing the number of required ADU/WF units.
- Planning should strike a balance between pedestrians and motor vehicles. There is a need to facilitate pedestrian connections between existing developments and the Innovation Center Metrorail Station. Future road infrastructure should be planned and designed with a location and scale that does not create barriers to pedestrians.
- Planning for roads and infrastructure must recognize the developed nature of much of the Study Area. While design standards for new roads and conceptual

streets are appropriate, they should not result in existing public improvements being discarded or dismantled.

- The Work Group supports the collective transportation objectives implicit in a grid of streets. However, because of the many significant existing improvements to public infrastructure, there should be reasonable flexibility in the location and configuration of a future street grid tailored to land planning on undeveloped or re-developing parcels in the Study Area.
- The Work Group spent considerable time and energy evaluating the Comprehensive Plan recommendation for an additional bridge crossing over the DAAR/Dulles Toll Road to connect Sunrise Valley Drive, located within the Study Area, with future transportation links on the north side of the DAAR/Dulles Toll Road. The Work Group acknowledges the transportation need for this crossing and endorses its continued retention in the County's Transportation and Comprehensive Plans. However, care should be taken in its design to avoid creating pedestrian barriers which could segregate the western end of the Transit Station Area from the Innovation Center station. The bridge design should avoid its becoming an impediment to pedestrian and other access to and from the Metrorail station. Similarly, given the uncertainties as to its timing and funding, the future bridge should not preclude or inhibit approval of near-term Transit Oriented Development which does not frustrate its eventual design and construction and which is otherwise consistent with the Comprehensive Plan.

As I referenced above, the members of the Work Group were unable to endorse two (2) recommendations in the Staff text for the proposed Plan amendments. The first concerns the amount of the monetary contribution required from nonresidential development to support Affordable and Workforce Housing. The second is the requirement to achieve specific reductions in storm water volume and run-off velocity in certain developments. I address the ADU/WF issue first.

The Work Group agrees with Staff that nonresidential development within the Transit Station Area should contribute toward the county policy of providing Affordable and Workforce Housing. However, the Work Group believes the recommended contribution of three dollars (\$3.00) per square foot is excessive and inequitable. We note this is the same rate adopted for development within the Tyson Corner planning area. The Work Group asked Staff to consider instead a two dollar (\$2.00) rate because rental rates and land values are considerably less in the Study Area. Staff investigated and subsequently informed the Work Group that its supposition about rents and land values is in fact supported by the data; office rental rates in the Study Area are approximately two-thirds (2/3) of those in Tysons. These key economic distinctions convince the Work Group the \$3.00 rate at Tysons Corner and the \$2.00 rate within the Innovation Center Transit Station Area are essentially equivalent economic commitments.

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As to the proposed stormwater management policy, the Work Group feels strongly that management of stormwater runoff and the associated environmental benefits are important. Accordingly, the Work Group endorses the Comprehensive Plan language reflecting these objectives. On the other hand, as members of the Commission are aware, the County's stormwater management and detention regulations are currently the subject of an ongoing discussion and review in preparation for changes in state law next summer. In that context, the Work Group believes the proposed Staff language is far too detailed for a planning document intended to have a durability measured in decades. Similarly, we find the text Staff has proposed is almost statutory in its construction and could well lead to inconsistencies or irregularities depending on how regulations may evolve outside the planning process. Some Work Group members expressed concern these prescribed reductions could prove unattainable in many instances given site conditions and proposed development plans particularly at lower intensities. For these reasons, the Work Group has proposed alternative text more appropriate for inclusion in the Comprehensive Plan. The Work Group respectfully submits this substitute text (shown in the text box on pages 19-20 of the proposed Text Amendments) which better promotes the goal of encouraging new development to implement the best available strategies to manage stormwater runoff.

In summary, the Work Group supports and advocates for adoption the Staff text amendments as qualified however by my comments above. We are grateful for Staff's collective effort of time and resources in this process. We are equally appreciative of the time and energy invested by large numbers of landowners and stakeholders in the Study Area. Given the collective depth of this exercise and the time which has been devoted to it, we urge you and your fellow Commissioners to give careful consideration to the recommendations of the Work Group.

On behalf of the members of the Work Group, I thank you for your consideration of this important matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jeff', with a stylized flourish at the end.

Jeffrey J. Fairfield, Chairman
Route 28 South Special Study Work Group

cc: Members of the Fairfax County Planning Commission